

EXHIBIT 40

In The Matter Of:

*Fair Fight Action v.
Raffensperger*

Eunice Walden

April 17, 2020

Telephonic Deposition

Regency-Brentano, Inc.

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Atlanta, Georgia 30329

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REGENCY-BRENTANO, INC.

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1 A. Yes.

2 Q. All right. Have you had any involvement
3 or interactions with Fair Fight, either before
4 submitting this declaration or afterward, up until,
5 of course, you received the subpoena from us and had
6 this deposition, any --

7 A. No.

8 Q. -- other interactions with Fair Fight?

9 A. No.

10 Q. Okay. Until you received the subpoena
11 from us, were you aware that your declaration had
12 been submitted in a lawsuit?

13 A. No.

14 Q. Do you know what this lawsuit is about?
15 And I don't mean in a -- I'm not asking you to
16 testify as an attorney. But are you familiar with
17 this lawsuit?

18 A. I'm assuming it's about me not being able
19 to vote.

20 Q. Okay. Well, that's what I mean, I'm not
21 asking you to assume. You are not a plaintiff on
22 behalf -- in this case, are you?

23 A. No.

24 Q. Okay. So all I'm asking is -- well, let
25 me ask this way: Before you received the subpoena,